

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Jeffrey K. Norling,

Plaintiff,

v.

Accounts Receivable Services, LLC,
and Stewart, Zlimen, & Jungers, Ltd.

Defendants.

Civil File No. 16-cv-3346-MJD-DTS

**DECLARATION OF DARREN
BRAAYER SCHWIEBERT**

Darren Brayer Schwiebert states as follows:

1. I am the attorney for Plaintiff Jeffrey K. Norling in the case.
2. After the Court lifted the stay, I met and conferred with defense counsel regarding Plaintiff's desire to amend the Complaint. I provided a redline copy showing all of the proposed amendments.
3. Defense counsel consented to all of the amendments in which allegations were removed from the Complaint, but refused to consent to any amendments that involved the insertion of allegations. A copy of our correspondence is attached as Exhibit A.
4. On October 23 and October 24 of 2017, while this case was stayed, I took the deposition of representatives of both Allina Health Systems and

Accounts Receivable Services, LLC in a different lawsuit. Attached as Exhibit B is the transcript from the deposition of Bonita Drennan of Accounts Receivable Services, LLC. Attached as Exhibit C is the transcript from the deposition of Jocelyn Fountain of Allina Health Services.

5. I declare under penalty that the foregoing is true and correct to the best of my knowledge.

Dated: May 23, 2018

s/Darren Brayer Schwiebert